Remark

Applicants respectfully request reconsideration of this application as amended. No Claims have been amended. Claims 4, 12, 18, 23 and 29 have been canceled. Therefore, claims 1-3, 5-11, 13-17, 19-22, 24-28 and 30 are now presented for examination.

35 U.S.C. §103 Rejection

Chang and Agnihotri

The Examiner has rejected claims 1-3, 5-11, 13-17, 19-22, 24-28 and 30 under 35 U.S.C. §103(a) as being unpatentable over Chang in view of Agnihotri, WO No. 03/030018 ("Agnihotri"). Chang shows a system which decodes closed caption text and presents it on an auxiliary display. Agnihotri shows a system which decodes closed caption text, translates the text and presents it on the same display with the video.

Claim 1, for example, recites "a video processor to generate character images of the translated text data." Neither reference explicitly discloses this. Chang shows a translated character in Figures 5c, 7a, and 7b, however there is no description of how these are generated. Agnihotri simply states that translated text data is displayed.

Claim 1, for example, further recites, "a video processor to...superimpose the character images over images of a video portion of the video signal." As the Examiner has recognized, Chang does not disclose this but uses a separate display. Agnihotri also does not disclose this. Agnihotri provides no disclosure of how the translated text data is displayed. It is reasonable to expect that translated closed caption data is generated and embedded into the VBI (vertical blanking interval).

In the Response to Arguments, the Examiner refers to Figure 1 and the Abstract of Agnihotri. The Abstract states only "displays the translated text data while simultaneously playing an audio and a video component of the synchronized signal." The natural reading of this is that the synchronized signal has an audio portion, a video portion, and that the translated text data is not a part of either. This suggests that the translated text data is supplied to the display separate and apart from the audio and video. Accordingly, the translated text is not character images superimposed over the video portion of the video signal.

The Examiner further refers to page 3, lines 25-27, "synchronizing the translated text data with the related video component..." Again, the natural reading is that the translated text data is separate from the video and therefore must be synchronized to it. If the text data were in the form of images superimposed over images of the video signal, then there would be no synchronization needed as images of the video signal would already include the translated text.

The Examiner further refers to page 6, lines 27-30, "the translated text data 46 is then formatted and correlated to the related video and sent to a display 40 along with the video component 18 of the originally received signal to be displayed simultaneously with the corresponding video..." Again, this section is clear in that the translated text data 46 is separate and apart from the corresponding video. It is described as such and it further requires correlation. It is sent "along with" not as part of the video signal.

The sentence at lines 30-32, "appropriate delays in the transmission may be made to synchronize the translated text data 46 with the pertinent audio and video" makes it clear that the translated text data and the pertinent audio and video are two separate signals. Character images are not superimposed over images of a video portion of the

video signal. The video portion of the video signal is separate and the translated text must be synchronized with it. This sentence also makes it clear that the translated text is not encoded as closed caption text and added to the VBI of the video signal. Using the VBI, the text in each VBI is inherently synchronized with the image following the VBI in the video signal. Instead Agnihotri requires a separate system to receive the translated text data and render it over the video. This means that the system will not operate with any standard television, but only those that include the special translated text data and synchronization signal decoder.

In the formal statement of the rejection of Claim 1 for obviousness, the Examiner refers also to page 3, lines 19-29. This section merely repeats the general language, discussed above, of synchronizing the translated text data.

The Examiner also refers to page 8, lines 4-9, which states simply that "embodiments of the invention can be implemented using general purpose processors or special purpose processors" and several other types of hardware configurations.

The Examiner then argues that the invention of Claim 1 would have been obvious "because superimposing the translated text on the active video which is being played and watched by a viewer allow him or her to watch the video and read the translation simultaneously without having to alternate their attention between the two." Of course, Agnihotri describes displaying the translated text on the "active" video. However, this is not what Claim 1 recites.

Claim 1 recites, generating character images and superimposing the character **images** over **images** of a video portion of the **video signal** (emphasis added). In both references the translated text is kept as a separate signal. In Agnihotri, the two are joined only on the display, using an undisclosed technique. The actual video signal and the

images of the video signal are unaffected by the systems in the references. To compensate for this, Chang uses a separate display and Agnihotri uses a synchronization signal.

The present invention presents a significant advance over the prior art because resulting video signal can be displayed on a standard television set. Since the translated text is superimposed over image of the video signal, any television that can display the video signal will also be showing the translated text without any processing or decoding being required by the television set. Chang uses a separate display system and Agnihotri requires a television set that can decode the additional signal and the synchronization signal and then combine the two to produce the screen image.

For these reasons, the rejection of Claim 1 is believed to be traversed. The remaining claims are believed to be allowable on similar grounds, *inter alia*. The dependent claims are also believed to be allowable for the additional limitations set forth in each such claim, respectively.

Conclusion

Applicants respectfully submit that the rejections have been overcome by the amendment and remark, and that the claims as amended are now in condition for allowance. Accordingly, Applicants respectfully request the rejections be withdrawn and the claims as amended be allowed.

Invitation for a Telephone Interview

The Examiner is requested to call the undersigned at (303) 740-1980 if there

remains any issue with allowance of the case.

Request for an Extension of Time

Applicants respectfully petition for an extension of time to respond to the

outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary.

Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37
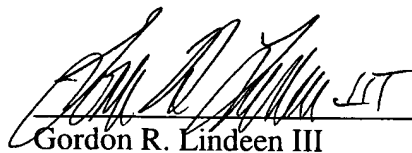
C.F.R. § 1.17(a) for such an extension.

Charge our Deposit Account

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: <u>January 28, 2011</u>

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